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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: ZOOM VIDEO COMMUNICATIONS,
INC. PRIVACY LITIGATION

Case No. 3:20-cv-02155-LB

This Document Relates To:

**CLASS PLAINTIFFS' NOTICE OF
MOTION AND MOTION TO EXPEDITE
BRIEFING ON MOTION FOR APPEAL
BOND; MEMORANDUM IN SUPPORT**

All Actions

Judge: Hon. Laurel Beeler

Date: TBD

Time: TBD

Location: Courtroom B, 15th Floor

1 Pursuant to Civil Local Rule 6-3, in the above-entitled action, Plaintiffs Caitlin Brice, Heddi N.
 2 Cundle, Isabelle Gmerek, Cynthia Gormezano, Kristen Hartmann, M.F. and his parent Therese
 3 Jimenez, Lisa T. Johnston, Oak Life Church, Saint Paulus Lutheran Church and Stacey Simins
 4 (collectively, “Plaintiffs”), respectfully move the Court to expedite the briefing schedule for Plaintiffs’
 5 Motion for Appeal Bond (“Bond Motion”) (Dkt. No. 278) and, if the Court decides that a hearing on
 6 the motion is necessary, schedule a hearing on the Bond Motion at the Court’s earliest convenience.

7 The Bond Motion is currently set on April 27, 2023, the earliest available date on the Court’s
 8 website. Plaintiffs are concerned that, absent relief, Plaintiffs and the Class will incur substantial,
 9 unrecoverable costs related to the Court-appointed Claims Administrator’s administration of the
 10 Settlement as well as responding to Objector and Appellant Alfred Gonzalez’s appeal. Expediting the
 11 briefing schedule for Plaintiffs’ Bond Motion will allow the Court to consider, and if appropriate,
 12 impose an appeal bond on Gonzalez at an earlier date protecting Plaintiffs and the Class as they
 13 continue to address his appeal, which Plaintiffs believe was filed solely to hold up the distribution of
 14 Settlement proceeds.

15 Therefore, Plaintiffs ask the Court to set an expedited schedule requiring Gonzalez to respond
 16 to Plaintiffs’ Bond Motion by March 17, 2023, and if the Court decides that a hearing on the Bond
 17 Motion is necessary, to hold a hearing on March 23, 2023 or such other date available to the Court. In
 18 support of this motion, Plaintiffs state as follows:

19 1. Plaintiffs request that the Court expeditiously resolve Plaintiffs’ Bond Motion, which is
 20 currently set to be heard on April 27, 2023. Given the nature of Gonzalez’s appeal, Plaintiffs are in the
 21 process of attempting to resolve the appeal by moving to dismiss based on Gonzalez’s failure to pay
 22 his docket fees and, if that is not granted, by then moving for summary disposition in the Ninth Circuit.
 23 If these motions are not granted, Plaintiffs are aware that resolution of any appeal can take one or two
 24 years, requiring Plaintiffs and the Class to incur costs to oppose the appeal and administer the
 25 Settlement funds during the delay. To account for that possibility, Plaintiffs seek the security that
 26 would be afforded by the imposition of an appeal bond against Gonzalez.

27 2. If the Court does not expedite briefing on the Bond Motion, Plaintiffs will be forced to
 28 continue to incur substantial costs responding to the frivolous appeal, as well as the resulting

SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing Joint Declaration of Wolfson and Molumphy in support of Motion to Expedite Briefing. Pursuant to L.R 5-1(i)(3) regarding signatures, I, Mark C. Molumphy attest that concurrence in the filing of this document has been obtained.

DATED: March 10, 2023

/s/ Mark C. Molumphy

Mark C. Molumphy